

### Remarks

Claims 1-14, 16-17, 19-33 and 35-38 remain in this application. Claims 15, 18 and 34 are hereby canceled without prejudice. Claims 1, 4, 6-7, 12-14, 16-17, 19, 28, 32-33, 35, and 38 are hereby amended. No new matter is being added.

#### Claim Rejections – 35 USC §§ 102 and 103

Claims 1-3, 18-21, and 34-36 were rejected under 35 U.S.C. 102(b) as being anticipated by or unpatentable over Morley et al. (WO 99/59335) or Morley et al. in view of Kowarz et al. Independent claims 1, 19, 35, and 38 are hereby amended so that it now includes various additional limitations relating to the novel encryption scheme of the present invention. Applicants respectfully traverse these rejections in relation to the claims as now amended.

For example, claim 1 as amended now recites as follows:

1. A method of securely displaying visual data comprising the steps of:  
generating a private key and a corresponding public key for a display apparatus;  
securely storing the private key within the display apparatus;  
communicating the public key from the display apparatus to an encryption apparatus;  
encrypting the visual data at the encryption apparatus using the public key, whereby encrypted visual data is formed;  
transporting the encrypted visual data from the encryption apparatus to the display apparatus;  
decrypting the encrypted visual data within the display apparatus such that an electronic version of the visual data is maintained within circuit elements that are substantially inaccessible; and  
displaying the visual data as a visual image.

Per the above, the method of claim 1 now requires "generating a private key and a corresponding public key for a display apparatus", "securely storing the private key within the display apparatus", "communicating the public key from the display apparatus to an encryption apparatus", and "encrypting the visual data at an encryption apparatus"

using the public key, whereby encrypted visual data is formed". These limitations are supported, for example, by FIGS. 1 and 2 and the description thereof on pages 3 and 4.

The encryption in Morley et al. is discussed as being performed at the compression/encryption system 110 located at a central hub 102 shown in FIG. 2A. Morley et al. states that the encryption is preferably performed using "real-time digital sequence scrambling of both image and audio programming". (See page 21, lines 12-21 of Morley et al.) Nowhere in Morley et al. is there a disclosure or suggestion of a method by which a public/private key pair for the encryption is generated for a display apparatus, the private key is securely stored within the display apparatus, the public key is communicated from the display apparatus to the encryption apparatus, and the visual data is encrypted at the encryption apparatus using the public key.

Morley does not disclose or suggest encryption keys for a display apparatus. On the contrary, Morley et al. teaches an "encrypted program key" that is for a video program. Hence, Morley et al. teaches against this claim limitation.

Moreover, Morley does not disclose or suggest communication of an encryption key from a display apparatus to an encryption apparatus. In contrast, Morley teaches that the encrypted program key is transmitted to authorized presentation or theater locations. (See page 22, lines 5-19 of Morley et al.) Hence, Morley also teaches against the claim limitation.

In addition, there is no disclosure or suggestion in Morley et al. of the secure storage of a private key at a display apparatus. Morley et al. merely discloses that an encrypted program key may be transferred days, weeks or just before an authorized showing to the theater location using a low data rate link or transportable storage media.

Regarding Kowarz et al., Kowarz et al. is cited in relation to a "grating light valve" aspect. Kowarz et al. does not disclose or suggest the above discussed limitations relating to the public/private key encryption scheme of the claimed invention.

Therefore, for at least the above-discussed reasons, claim 1 as amended is now patentably distinguished over the cited art. Claims 2-14 and 16-17 depend from claim 1 and so are patentably distinguished over the cited art for at least the same reasons.

In similar fashion, independent claims 19, 35, and 38 are also amended in relation to the disclosed public/private key encryption scheme. Claim 19 now recites that "the encryption apparatus uses a public key for encrypting the visual data" and that "the display apparatus uses a private key for decrypting the visual data, the private key residing within the display apparatus." Similarly, claims 35 and 38 now recite that "the display apparatus uses a private key for decrypting the encrypted visual data", "the private key resides within the display apparatus", and "the encrypted visual data was previously generated using a public key corresponding to the private key." As discussed above, the cited art does not disclose or suggest these limitations. Hence, claims 19, 35 and 38 as amended are now patentably distinguished over the cited art.

Claims 20-30 and 32-33 depend from claim 19 and so are patentably distinguished over the cited art for at least the same reasons as discussed above in relation to claim 19. Claims 36-37 depend from claim 35 and so are patentably distinguished over the cited art for at least the same reasons as discussed above in relation to claim 35.

Conclusion

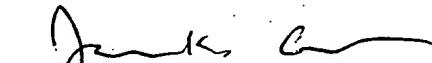
For at least the above-discussed reasons, applicants believe that claims 1-14, 16-17, 19-33 and 35-38 are now patentably distinguished over the prior art. Favorable action is respectfully requested.

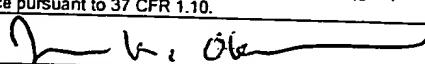
The examiner is also invited to call the below-referenced attorney to discuss this case.

Respectfully Submitted,

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